

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

MANUEL E. PINALES, *et al.*,
Defendants.

No. 04-10314-RCL

**ASSENTED-TO MOTION TO EXCLUDE TIME FROM
MARCH 5, 2007, THROUGH MAY 1, 2007 UNDER SPEEDY TRIAL ACT**

The United States of America, with the assent of the defendants, Marcus Mitchell, Aquiles Tejeda, Jose Miguel Obijo, Mark Collins, Luis R. Clas, Candido Santos, and Tajh M. White, hereby moves this Honorable Court to exclude the time from March 5, 2007 to and including May 1, 2007 under the Speedy Trial Act.

In support of this motion, the government states that this Honorable Court conducted a status conference in this matter on March 5, 2007, at which counsel for all parties requested additional time to resolve outstanding discovery issues. All parties assented to the scheduling of a further status conference on May 1, 2007, and agreed that the time from March 5, 2007 through May 1, 2007 should be excluded under the Speedy Trial Act. The Court's last Order, which was issued on January 9, 2007, see Docket Entry 127, excluded time from January 9, 2007, up to and including March 5, 2007, from the Speedy Trial Act.

After confirming that the defendants assented to this motion, the Court directed undersigned counsel for the government to file an assented-to motion based on this agreement, which serves the ends of justice and outweighs the interests of the public and the defendants in a speedy trial. Accordingly, the exclusion is warranted under 18 U.S.C. § 3161(h)(8).

WHEREFORE, the government respectfully requests that the time from March 5, 2007 to and including May 1, 2007, be excluded from the time within which this case must be tried under the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ William F. Bloomer
William F. Bloomer
Sharron Kearney
Assistant U.S. Attorneys
(617) 748-3100

Dated: March 5, 2007

CERTIFICATE OF SERVICE

I, William F. Bloomer, hereby certify that this document filed through the ECF system on March 5, 2007, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non registered participants this date via US Postal Service, postage prepaid.

/s/ William F. Bloomer
William F. Bloomer